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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

v.

LEVI GRAY, JAYSON LEAK, PAUL
KIZER, JOHN WALLACE, JAMIE
DENNISON, FELIPE URZUA-PEREZ,
STEPHEN MARTIN, THOMAS JOST,
ROBERT YONALLY, LISA ARRINGTON,
CHAD NAUGLE, NICOLE BROWN, MIKE
REESE, and JOHN DOE,

Defendants.

NO. 3:23-cv-01962

PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO
DEFENDANT LEVI GRAY

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT LEVI GRAY

Pursuant to Fed. R. Civ. P. 33, Plaintiff hereby submits the following Interrogatories to

Defendant, Levi Gray. Plaintiff requests that Defendant serve its answers, in writing and under oath, to the undersigned counsel for Plaintiff at Disability Rights Oregon, 511 SW 10th Avenue, Suite 200, Portland, OR 97205, within 30 days of service of these Interrogatories.

Answer each interrogatory fully. If you object to any interrogatory, state the reasons for objection and answer to the extent the interrogatory is not objectionable. If you are unable to answer an interrogatory fully, submit as much information as is available, explain why your answer is incomplete, and identify or describe all other sources of more complete or accurate information. Please feel free to use additional pages to answer the questions, if necessary, but clearly label the questions and answers.

DEFINITIONS

1. Pornography means any pictures, stories, videos, audio recordings, or animation that depicts, or is related to nudity or sexual acts. This includes the depiction or presentation of devices commonly known as dildoes, vibrators, butt plugs, or similar items.
2. PREA means the Prison Rape Elimination Act.
3. "Document" means any written, recorded, or graphic material. That could include text messages, emails, social media posts, letters, forms, pictures, or any other type of relevant material. This could be something on paper, but could also be electronic in a storage device, database, computer program, or cloud.

INTERROGATORIES

INTERROGATORY #1: Describe in detail any PREA complaints that you are aware of involving either yourself or any other employee of Coffee Creek Correctional Facility.

ANSWER:

INTERROGATORY #2: Describe in detail any times that you provided, referenced, alluded to, mentioned, or otherwise communicated about pornographic or offensive materials with staff at CCCF or any AICs housed at CCCF.

ANSWER:

INTERROGATORY #3: Describe in detail your relationship with co-defendant Jayson Leak. Document any disagreements that you have had with Mr. Leak and any changes in your friendship or work relationship with him.

ANSWER:

INTERROGATORY #4: Provide your employment history since January 1, 2022, including location, dates of employment, job title, job description, and supervisor's name. Include any information related to personnel actions or complaints registered against you.

ANSWER:

INTERROGATORY #5: State the name, address, phone number, and electronic-mail address of each individual whom you know or believe to have knowledge of facts or circumstances related to this case and provide a summary of the facts or circumstances each such person knows.

ANSWER:

INTERROGATORY #6: Identify all documents which contain information concerning the subject matter of this case, including any documents related to personnel actions taken by CCCF or ODOC towards you. State how you received the document, who sent it, and who might be able to testify about it.

ANSWER:

INTERROGATORY #7: Identify all social media websites or applications that you used, participated on, posted photos, opinions, or statuses, or otherwise had an account with/on at any point during or after January 1, 2020 and for each, state your username, account name, or any other identifier for your account.

ANSWER:

INTERROGATORY #8: Identify all individuals that have provided information to you about phone call(s) placed or received by J.B. from any correctional facility.

ANSWER:

INTERROGATORY #9: Identify all ODOC employees that you have had contact regarding J.B. since your removal from CCCF on May 24, 2023.

ANSWER:

Respectfully submitted,

June 13, 2024

/s/ David A. Boyer

David A. Boyer, OSB #235450
Attorney for Plaintiff, J.B.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was this date served upon the following via email. Both a PDF and Microsoft Word document were included in the email. Additionally, a copy was sent to Defendant Gray via United States Postal Service.

/s/ David A. Boyer

Defendant Levi Gray:
2232 SE Pine St. #7
Portland, OR 97214
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All Other Defendants:
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